

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
24-60061-CR-LEIBOWITZ/AUGUSTIN-BIRCH
CASE NO. _____**

**18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1956(h)
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)**

UNITED STATES OF AMERICA

vs.

**KELVIN OWUSU NKWANTABISA,
a/k/a “Kevin Brown,”
a/k/a “KO,”
LESHEA MOORE,
a/k/a “Deborah Green,”
JOHN JOUISSANCE, and
JUSTICE AMOH,
a/k/a “Samuel Andrews,”**

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

The Defendants and Other Entities

1. Defendant **KELVIN OWUSU NKWANTABISA** was a resident of Atlanta, Georgia.
2. Defendant **LESHEA MOORE** was a resident of Acworth, Georgia.
3. Defendant **JOHN JOUISSANCE** was a resident of Canal Winchester, Ohio.

4. Defendant **JUSTICE AMOH** was a resident of Bronx, New York.

The Victims

5. Victim 1 was a corporation located in Coral Springs, Florida.
6. Victim 2 was a law firm located in Mooresville, North Carolina.
7. Victim 3 was a corporation located in Suffolk, England.
8. Victim 4 was a corporation located in Elizabeth, New Jersey.
9. Victim 5 was an investor who resided in Auckland, New Zealand.

Definitions

Business Email Compromise Schemes

10. Business email compromise (“BEC”) schemes were sophisticated scams targeting businesses and companies that regularly perform wire transfer payments. The scams were carried out by compromising legitimate business e-mail accounts through social engineering or computer intrusion techniques to conduct unauthorized transfers of funds.

COUNT 1
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as though fully set forth herein.

2. From at least as early as in or around August 2022, and continuing through in or around March 2024, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

KELVIN OWUSU NKWANTABISA,
a/k/a “Kevin Brown,”
a/k/a “KO,”
LESHEA MOORE,
a/k/a “Deborah Green,”

**JOHN JOUISSANCE, and
JUSTICE AMOH,
a/k/a “Samuel Andrews,”**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit certain offenses against the United States, that is, to knowingly, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by compromising the business email accounts of Victims 1 through 5 (“the Victims”) by inducing the Victims to believe that they were sending wire transfer payments to legitimate business partners when, in truth, the Victims were actually sending wire transfer payments to members of the conspiracy.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the object and purpose of the conspiracy included, among other things, the following:

4. **KELVIN OWUSU NKWANTABISA, LESHEA MOORE, JOHN JOUISSANCE, JUSTICE AMOH** and their co-conspirators opened, and caused to be opened,

shell companies and bank accounts in the names of those shell companies for the purpose of receiving stolen victim funds.

5. Co-conspirators compromised and caused to be compromised the business email accounts of victims for the purpose of monitoring and intercepting emails, specifically those discussing wire transfer payments.

6. Co-conspirators, pretending to be legitimate business partners of the victims, sent and caused to be sent emails containing false and fraudulent requests for payment and wire instructions to victims, including Victim 1, to induce the victims to transfer money into bank accounts that were controlled by the defendants and their co-conspirators.

7. Based upon the false and fraudulent requests for payment and wire instructions, victims of this scheme wired over \$7,000,000 in payments, via interstate wire, to bank accounts controlled by the defendants and their co-conspirators.

8. **KELVIN OWUSU NKWANTABISA, LESHEA MOORE, JOHN JOUISSANCE, JUSTICE AMOH** and their co-conspirators used the proceeds of the fraud for their personal use and benefit, the use and benefit of others, and to further the fraud.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-5
Wire Fraud
(18 U.S.C. § 1343)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as though fully set forth herein.

2. From at least as early as in or around August 2022, and continuing through in or around March 2024, in Broward County, in the Southern District of Florida and elsewhere, the defendants,

KELVIN OWUSU NKWANTABISA,
a/k/a “Kevin Brown,”
a/k/a “KO,”
LESHEA MOORE,
a/k/a “Deborah Green,”

did knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE SCHEME AND ARTIFICE

3. The allegations contained in the Purpose of the Conspiracy section of Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the purpose of the scheme and artifice.

THE SCHEME AND ARTIFICE

4. The allegations contained in the Manner and Means Section of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

USE OF THE WIRES

5. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants, **KELVIN OWUSU NKWANTABISA** and **LESHEA MOORE**, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud, and to obtain money and property by means of false and

fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, did knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, as more specifically described below:

COUNT	APPROXIMATE DATE	DESCRIPTION OF WIRE
2	December 21, 2022	Victim 1, located in Coral Springs, Florida, initiated a wire of approximately \$341,488 from a Wells Fargo bank account in San Francisco, California to a Truist bank account in Byron, Georgia
3	January 4, 2023	Victim 1, located in Coral Springs, Florida initiated a wire of approximately \$441,173 from a Wells Fargo bank account in San Francisco, California to a Truist bank account in Byron, Georgia
4	January 10, 2023	Victim 1, located in Coral Springs, Florida initiated a wire of approximately \$301,144 from a Wells Fargo bank account in San Francisco, California to a Truist bank account in Byron, Georgia
5	January 18, 2023	Victim 1, located in Coral Springs, Florida initiated a wire of approximately \$296,136 from a Wells Fargo bank account in San Francisco, California to a Truist bank account in Byron, Georgia

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 6
Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))

From at least as early as in or around August 2022, and continuing through at least in or around March 2024, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

KELVIN OWUSU NKWANTABISA ,
a/k/a “Kevin Brown,”
a/k/a “KO,”
LESHEA MOORE,
a/k/a “Deborah Green,”

did knowingly and voluntarily combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, namely:

(a) to knowingly conduct a financial transaction affecting interstate commerce, which financial transaction involved the proceeds of specified unlawful activity, knowing the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly engage in a monetary transaction affecting interstate and foreign commerce, by, through, and to a financial institution, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which any of the defendants, **KELVIN OWUSU NKWANTABISA, LESHEA MOORE, JOHN JOUISSANCE**, and **JUSTICE AMOH**, have an interest.

2. Upon conviction of a violation, and/or conspiracy to commit a violation, of Title 18, United States Code, Section 1343, as alleged in this Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendant shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

4. The property subject to forfeiture as a result of the alleged offenses includes, but is not limited to, a sum of money the value of which represents the total amount of involved in or derived from the alleged offenses and may be sought as a forfeiture money judgment.

5. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

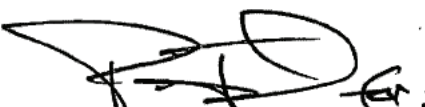
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL 


FOREPERSON



MARKENZY LAPOINTE
UNITED STATES ATTORNEY



QUINSHAWNA S. LANDON
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

24-60061-CR-LEIBOWITZ/AUGUSTIN-BIRCH

CASE NO.: _____

UNITED STATES OF AMERICA

v.

CERTIFICATE OF TRIAL ATTORNEY

KELVIN OWUSU NKWANTABISA, et al.

Defendants.

Court Division (select one)

- ☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No
15. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? Yes

By: _____

Quinshawna S. Landon

Assistant United States Attorney

FL Bar No. 99835

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOHN JOUISSANCE

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 20 years imprisonment

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** Three Years

* **Max. Fine:** \$250,000 or twice the gross gain or loss (whichever is greater)

Count #: 6

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956(h)

* **Max. Term of Imprisonment:** 20 years imprisonment

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** Three years

* **Max. Fine:** \$500,000 or twice the value of the property involved in the transaction (whichever is greater)

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
24-60061-CR-LEIBOWITZ/AUGUSTIN-BIRCH
CASE NO. _____

IN RE SEALED INDICTMENT

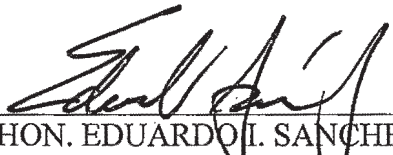
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SEALED ORDER

The United States of America, having applied to this Court for an Order sealing the Indictment and this order, and the Court finding good cause:

IT IS HEREBY ORDERED that the Indictment, arrest warrants, and this Order shall be filed under seal until the arrest of the first defendant or until further order of this Court, except that, the United States Attorney's Office and the Department of Homeland Security, Homeland Security Investigations may obtain copies of any Indictment, arrest warrants, or other sealed document for purposes of arrest, extradition, or any other necessary cause.

DONE AND ORDERED in chambers at Miami, Florida, this 23rd day of APRIL, 2024.



HON. EDUARDO L. SANCHEZ
UNITED STATES MAGISTRATE JUDGE

cc: Quinshawna Landon, Assistant United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
24-60061-CR-LEIBOWITZ/AUGUSTIN-BIRCH
CASE NO. _____

IN RE SEALED INDICTMENT

_____ /

MOTION TO SEAL

NOW COMES the United States of America, by and through its undersigned attorney, and respectfully requests that the foregoing Indictment, arrest warrants, and any resulting order be SEALED until the arrest of the first defendant, or until further order of this Court, excepting the United States Attorney's Office and the Department of Homeland Security, Homeland Security Investigations, which may obtain copies of any Indictment, arrest warrants, or other sealed document for purposes of arrest, extradition, or any other necessary cause, for the reasons that the integrity of the ongoing investigation might be compromised, and the defendants might flee should knowledge of this Indictment become public. The Assistant United States Attorney is prepared to provide further information *in camera* should the Court so require.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: 

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